

John D. Freed (SBN 261518)
jakefreed@dwt.com
DAVIS WRIGHT TREMAINE LLP
50 California Street, Floor 23
San Francisco, California 94111
Telephone: (415) 276-6500
Facsimile: (415) 276-6599

Attorneys for Plaintiff
CONFLUENT, INC.

Grant Damon-Feng (SBN 319451)
grantdamonfeng@dwt.com
Sharon Alice Joseph (*admitted pro hac vice*)
sharonjoseph@dwt.com
DAVIS WRIGHT TREMAINE LLP
1251 Avenue of the Americas, 21st Fl.
New York, New York 10020-1104
Telephone: (212) 603-6479
Facsimile: (212) 379-5279

Kathleen A. Stimeling
kstimeling@rshc-law.com
RILEY SAFER HOLMES &
CANCILA LLP
456 Montgomery Street, 16th Floor
San Francisco, CA 94104
Telephone: (415) 275-8565

Attorneys for Defendant
ROMANO NINASSI

Matthew A. Blumenreich
mblumenreich@rshc-law.com
RILEY SAFER HOLMES &
CANCILA LLP
810 Seventh Avenue, Suite 3505
New York, New York 10019
Telephone: (212) 660-1075

**IN THE UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF CALIFORNIA**

CONFLUENT, INC.,

Plaintiff,

v.

ROMANO NINASSI,

Defendant.

Case No. 5:25-cv-01260-VKD

**STIPULATION TO CONTINUE (A)
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S COMPLAINT,
(B) DEADLINE FOR JOINT CASE
MANAGEMENT STATEMENT, AND (C)
DATE OF INITIAL CASE MANAGEMENT
CONFERENCE**

Assigned to Hon. Virginia K. DeMarchi

Action filed February 5, 2025

STIPULATION

Plaintiff Confluent, Inc. (“Confluent”) and Defendant Romano Ninassi (“Ninassi”) (together, the “Parties”), by and through their respective attorneys, jointly and respectfully move the Court for an order extending the deadline for Ninassi to respond to Confluent’s Complaint, the deadline for the Parties’ Joint Case Management Statement, and the date of the Initial Case Management Conference by ninety (90) days each:

WHEREAS, on February 5, 2025, Confluent filed its Complaint against Ninassi [Dkt. No. 1];

WHEREAS, on April 29, 2025, the Parties filed a Stipulation to continue certain case deadlines and Initial Case Management Conference [Dkt. No. 11];

WHEREAS, on April 30, 2025, the Court entered new deadlines and continued the Initial Case Management Conference [Dkt. No. 12];

WHEREAS, the Parties’ Joint Case Management Statement is due on July 11, 2025;

WHEREAS, the Parties’ Initial Case Management Conference is currently set for July 22, 2025;

WHEREAS, Ninassi’s current deadline to answer or otherwise respond to the Complaint is July 15, 2025;

WHEREAS, the Parties, through their respective counsel, have been in communication regarding the allegations in the Complaint and Ninassi’s response via email and telephone, including meet-and-confers, with the most recent conference on July 2, 2025;

WHEREAS, the Parties, through their respective counsel, have made progress in pursuing amicable resolutions to this Matter and seek to avoid expending Court resources and unnecessary expenses;

WHEREAS, the Parties require additional time to confer and investigate the facts relating to the Complaint and further explore amicable resolutions to this Matter;

WHEREAS, the Parties agree that, given the status of the pleadings and ongoing discussions about amicable resolutions to this Matter, an Initial Case Management Conference is premature at the present time;

WHEREAS, the Parties, through their respective counsel, have met and conferred and agree that Ninassi shall have an additional ninety (90) days to file a responsive pleading to the Complaint.

NOW THEREFORE, based on the foregoing, the Parties, through their undersigned counsel of record, hereby stipulate and agree, subject to the Court's approval, as follows:

1. The Parties' deadline to submit their Joint Case Management Statement shall be continued from July 11, 2025 to **October 9, 2025**.

2. The Initial Case Management Conference shall be continued from July 22, 2025 to **October 20, 2025**.

3. Ninassi's deadline to answer, move, or otherwise respond to the Complaint shall be continued from July 15, 2025 to **October 13, 2025**.

Dated: July 7, 2025

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ John D. Freed
John D. Freed

Attorneys for Plaintiff
CONFLUENT, INC.

RILEY SAFER HOLMES & CANCELA LLP

By: /s/ Kathleen A. Stimeling
Kathleen A. Stimeling

Attorneys for Defendant
ROMANO NINASSI

[PROPOSED] ORDER

Presently before the Court is a Stipulation to Continue (A) Deadline for Defendant to Respond to Plaintiff's Complaint, (B) Deadline for Joint Case Management Statement, and (C) Date of Initial Case Management Conference ("Stipulation"). Good cause appearing the Court GRANTS the Stipulation as follows:

1. The Initial Case Management Conference shall be continued from July 22, 2025 to October 20, 2025.
2. The Parties' deadline to submit their Joint Case Management Statement shall be continued from July 11, 2025 to October 9, 2025.
3. Defendant Ninassi's deadline to answer, move, or otherwise respond to the Complaint shall be continued from July 15, 2025 to October 13, 2025.

IT IS SO ORDERED.

Date: _____

Hon. Virginia K. DeMarchi
United States Magistrate Judge

CERTIFICATION OF CONCURRENCE

Pursuant to L.R. 5-1, I hereby attest that Kathleen A. Stimeling, counsel for Defendant Romano Ninassi, has provided her concurrence in the electronic filing of the foregoing document entitled STIPULATION TO CONTINUE (A) DEADLINE FOR DEFENDANT TO RESPOND TO PLAINTIFF'S COMPLAINT, (B) DEADLINE FOR JOINT CASE MANAGEMENT STATEMENT, AND (C) DATE OF INITIAL CASE MANAGEMENT CONFERENCE.

/s/ John D. Freed
John D. Freed

DAVIS WRIGHT TREMAINE LLP